

EXHIBIT 2

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK
4 Civil No.: 19 Civ. 08655 (LGS) (GWG)

5 -----x
6 ULKU ROWE,

7
8 Plaintiff,

9
10 - against -

11
12 GOOGLE LLC,

13 Defendant.

14 -----x

15 October 14, 2020

16 9:39 a.m.

17 Videotaped Deposition of ULKU ROWE,
18 taken by Defendant, pursuant to Notice,
19 held via Google Hangouts videoconference,
20 before Todd DeSimone, a Registered
21 Professional Reporter and Notary Public of
22 the States of New York and New Jersey.
23
24
25

1 U. ROWE

2 Q. Other opportunities, and are
3 those other job opportunities that you
4 sought and did not get?

5 A. There was at least one of
6 those.

7 Q. And when was that?

8 A. So the denied promotion was the
9 VP of financial services, and later I
10 raised my hand for a VP of sales role in
11 financial services, the head of financial
12 services and sales, that was the role.

13 Q. So the first one is the
14 financial services vertical head job,
15 correct?

16 A. Correct, VP of -- yes.

17 Q. And that was the job that you
18 claim was given to Stuart Breslow, right?

19 A. Correct.

20 Q. Just to make sure we're talking
21 about the same thing, okay. Tell me again,
22 what was the second opportunity that you
23 were denied?

24 A. I raised my hand for the VP of
25 financial services role and sales.

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2 Q. And when was that?

3 A. I don't remember the exact
4 timing, but I think it was earlier this
5 year.

6 Q. So you think sometime in 2020,
7 early 2020?

8 A. Yes.

9 Q. Before or after the pandemic
10 shut down the country, can you place it
11 that way?

12 A. Before.

13 Q. Before, okay, so sometime
14 before the middle of March, is that fair to
15 say?

16 A. Yes.

17 Q. And was that a job that was
18 posted internally at Google?

19 A. I don't know if there was a job
20 posting. I didn't see a posting.

21 Q. We will come back to that.

22 But I want to go back to the
23 second item that you mentioned, and that is
24 you said that you were discriminated
25 against on a day-to-day basis. So on that

1 U. ROWE

2 Google?

3 A. I have not.

4 Q. Have you ever been through the
5 leveling process at Google, as a
6 participant in the process of leveling
7 someone?

8 A. I have not.

9 Q. Have you ever participated in a
10 hiring committee?

11 A. I have not.

12 Q. Have you ever participated in
13 any way in the decision-making process that
14 leads to the leveling of someone at hire at
15 Google?

16 A. I have done a lot of
17 interviews, but no, I have not specifically
18 been involved in leveling discussions, no.

19 Q. And in any of those interviews,
20 were you asked to offer an opinion as to
21 the level that someone was supposed to --
22 that someone might get?

23 A. I have not.

24 Q. You indicated earlier in your
25 testimony that there was another

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2 opportunity, VP, financial services and
3 sales, that you applied for in 2020. Do
4 you recall that testimony?

5 A. I raised my hand for it.

6 Q. What do you mean when you say
7 you raised your hand for it?

8 A. I expressed interest in it.

9 Q. And how did you express
10 interest in it?

11 A. I heard from Kristen, and I'm
12 completely blanking on her last name,
13 Kristen runs sales for U.S., and I had -- I
14 had a one-on-one with her, and she
15 mentioned that she was thinking of hiring a
16 VP of sales for financial services, and I
17 told her that I would be interested.

18 Q. And what, if anything, happened
19 next in connection with your interest in
20 that job?

21 A. So she asked me to reach out to
22 HR, so I reached out to HR.

23 Q. Who did you reach out to in HR?

24 A. I think it was Stuart Weidman,
25 I'm not 100 percent sure.

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2 Q. What happened next?

3 A. He said that he would talk to
4 Kristen and come back to me.

5 Q. And did he?

6 A. He did.

7 Q. And what happened next?

8 A. He said that based on the
9 conversations with Kristen, that they
10 weren't going to go ahead with me.

11 Q. Did he tell you anything more,
12 did he give you any more details?

13 A. I don't remember a lot of the
14 details, but I was surprised when he said
15 based on your interview with Kristen, I did
16 not have an interview with Kristen, this
17 was like a casual one-on-one get-together,
18 I found out about the opportunity during
19 that meeting, and that, you know, he told
20 me that based on that conversation that I
21 was being discounted, I was surprised.

22 Q. And was that the end of it?

23 A. Yes.

24 Q. Did you ever follow up with
25 Kristen?

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2 A. I don't -- I don't believe so.

3 Q. Do you know who got the job?

4 A. At the end I think it went to
5 Yolande.

6 Q. To who?

7 A. Yolande, I think her last name
8 is Piazza.

9 Q. Piazza?

10 A. Yes.

11 Q. Do you have any reason to
12 believe that you were not chosen for that
13 role because of your sex?

14 A. Look, I think that, you know,
15 at this point it was the combination of
16 everything that I went through at Google.
17 I think that was, you know, part of the
18 retaliation that I experienced.

19 Q. Tell me what leads you to
20 believe that you were not selected for the
21 role that was given to Yolande Piazza
22 because of any of your protected activity.

23 A. Well, you know, I raised
24 concerns at Google. First I was demoted, I
25 was isolated both internally and

1 U. ROWE

2 externally, and now here I was raising my
3 hand for another role and I was being
4 denied the opportunity.

5 Q. Let me ask you the question
6 more broadly.

7 What, if anything, leads you to
8 believe that anything that has happened to
9 you at Google is because of any complaints
10 you have raised about discrimination?

11 A. Look, I think I raised a
12 concern, and I raised a concern due to my
13 gender and how I was treated, and then
14 shortly after that I was demoted and all
15 these things happened, so it was my natural
16 conclusion.

17 Q. So other than the sequence of
18 timing, is there anything else that leads
19 you to believe that anything that happened
20 to you at Google was because of your
21 complaints of discrimination?

22 MS. GREENE: Objection.

23 A. Look, I don't know, you know, I
24 don't know everything that happened. Like
25 I am just sharing my experiences of what

1 U. ROWE

2 happened.

3 Q. So, again, other than the
4 sequence of timing, is there anything else
5 that leads you to believe that anything
6 that happened to you at Google was because
7 of your complaints of discrimination?

8 MS. GREENE: Objection.

9 A. I think it's not just the
10 sequence of events, but actually what
11 happened as well.

12 Q. And the "what" is you say you
13 were demoted, you say you were isolated,
14 and you were denied this other job that was
15 given to Yolande Piazza?

16 A. Correct.

17 Q. Those are the things that
18 happened?

19 A. Correct.

20 Q. And my question to you is other
21 than the sequence of timing between your
22 complaints of discrimination and the timing
23 of those things I just mentioned, other
24 than the timing, is there anything else
25 that leads you to believe that those events

1 U. ROWE

2 were because of your complaints of
3 discrimination?

4 MS. GREENE: Objection.

5 A. Again, it's not just the
6 timing, you know, I was isolated.

7 Q. Then what else is it?

8 A. Because like I was isolated
9 when my male peers were not isolated. When
10 they were given opportunities, I wasn't
11 given opportunities. So it is not just,
12 you know, the sequence of what happened,
13 but like what I experienced during that
14 time.

15 Q. So what you describe as
16 isolating, being isolated, what leads,
17 other than the sequence of timing, other
18 than those events occurring which you
19 already testified about today -- withdrawn.
20 Let me ask you more specifically.

21 When you say being isolated,
22 you are talking about your testimony about
23 not being invited to meetings, correct?

24 A. That's one of the things.

25 Q. Not being invited to client

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2 events, right?

3 A. That's another one of those.

4 Q. Not being invited to off-sites,
5 right?

6 A. That's also one of those.

7 Q. Okay, what else was there?
8 What else constitutes the isolations?

9 A. I was isolated, one, because I
10 was told that I couldn't focus on financial
11 services anymore, so Google removed that
12 responsibility from me. And that meant
13 that I was isolated from any discussions
14 around, you know, go to market, around
15 customer interactions, around, you know,
16 press and media appearances, and I was
17 isolated on, you know, what events I could
18 go talk to.

19 So there was a lot of these
20 things that I was isolated by whereas, you
21 know, my male peers, Stuart Breslow and
22 others, weren't.

23 Q. When were you told that you
24 were no longer to focus on financial
25 services?